

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

**In the Matter of:**

Toll Free Access Codes

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CC Docket No. 95-155

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**Reply Comments of the United States Telephone Association**

The United States Telephone Association (USTA) submits these reply comments in response to the Notice of Proposed Rulemaking issued in the above-referenced proceeding.<sup>1</sup> USTA is the principal trade association of the local exchange carrier (LEC) industry. USTA represents over 1100 LECs, with a wide variety of company sizes within its membership.

The record in this proceeding verifies that the Commission must determine whether any rights or relationships should be established between ten-digit numbers in the 800 service access code and the 888 NPA (or other toll free codes). The record also reflects that sound law and policy dictates that no such rights or relationship should be established. USTA notes, however, that there are important practical considerations that also bear on this question.

Specifically, the Commission should establish as a priority the implementation of the 888 code by the agreed upon date - March 1, 1996. If that is to be accomplished, the Commission should not establish any rights or relationships between numbers in different codes. Any action which changes the present system of number assignment would require not only rule development, but enhancements to a number of systems. Development of these rules, and enhancements to these systems would not permit sufficient time to implement the 888 code in

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<sup>1</sup>Toll Free Access Codes, Notice of Proposed Rulemaking, CC Docket No. 95-155, (released October 5, 1995) ("NPRM").

an orderly manner. The correct decision, both as a practical matter and as a matter of policy, is to not establish any rights to a particular telephone number, implement the 888 code on schedule, and direct the Industry Carriers Compatibility Forum (ICCF) to begin planning to implement the 877 toll free service access code.

**I. The Comments Support the Goal of Establishing an Environment in Which Numbers Are Perceived As In Adequate Supply**

The NPRM correctly notes that numbers in the toll free service access codes comprise a finite and valuable public resource. NPRM, para. 1. It might be helpful for the Commission to determine that there are actually two aspects of the numbering resource which create scarcity: 1) the availability of numbers themselves, and 2) the ability of the network to process calls using those numbers. While numbers are a scarce commodity, the resources required to develop additional network capabilities to process new numbers are even more scarce. Accordingly, the Commission should promote measures which make parties aware that numbers in the 888 code will be available, and that their economic interests would be served by utilizing numbers efficiently. Efficient use of numbers will thus increase the efficiency of the Commission's and the industry's use of valuable resources (resources which are often not readily available) needed to implement additional codes.

In this light, USTA supports those commenters who note that while the Commission should adopt rules which deter the hoarding of numbers, the Commission should avoid imposing overly burdensome regulations on the toll free services market, or micro-managing the number assignment process. See, e.g., Comments of Ameritech at 4-5; Comments of Airtouch Paging at 3. Excessive regulation will only enhance the "gold rush" mentality which exacerbates the depletion of toll free service code resources. Excessive government intervention could also complicate matters which are effectively being addressed through industry processes. As noted in the comments of the Service Management System/800 Number Administration Committee (SMS/SNAC), the industry plan to implement 888 will provide for an orderly transition to the next toll free NPA while minimizing the ability of interested parties

to overload the SMS/800 and SCP processes and/or to prematurely deplete the pool of 888 numbers.

For example, the Commission should not adopt the suggestion to adopt part or all of the assignment guidelines as formal rules. NPRM, para. 23. Adoption as formal rules would then require notice and comment proceedings to make changes to these guidelines. Moreover, this type of regulatory intervention is unnecessary. See Comments of Ameritech at 17. Any policies or procedures adopted by the Commission can be incorporated in a set of voluntary industry guidelines - there is unlikely to be difficulty reaching consensus on these issues.

Commenters are correct, however, to identify a Commission role in establishing some processes which will promote the efficient allocation of numbers to the extent that the competitive implications of number assignment make industry resolution difficult. For example, the record evidences support for Commission rules requiring an affirmative subscriber request for assignment of a number. See, e.g., Comments of MFS at 2; Comments of Bell Atlantic at 2.

## **II. The Record Evidences Strong Support For the Principle That The Commission Should Not Recognize Or Establish Any Right to A Particular Telephone Number**

The record reflects a strong interest on the part of certain companies who have been assigned particular 800 numbers, particularly “vanity” 800 numbers, to obtain a property right, right of first refusal, or some other preference with respect to corresponding ten-digit numbers in the 888 service code. See, e.g., Comments of 1-800-FLOWERS SM, Inc., at 5; Comments of American Car Rental Association (ACRA) at 4-5; Comments of Direct Marketing Association (DMA) at 1-3. Numerous other commenters have recognized, however, that establishing a right of first refusal would be contrary to established law and sound policy, and would have adverse consequences for the practice of assigning numbers. The Commission should not accept speculative concerns regarding customer confusion between telephone

numbers or fraudulent behavior by business competitors as a basis for subverting a number assignment system which has worked well. See, e.g., Comments of Cable and Wireless at 3-4; Comments of Airtouch Paging at 14; Comments of CompTel at 12. To the extent that these problems do arise, they can be dealt with by direct customer education efforts, and by appropriate sanctions on improper conduct. Any claim for a need to create “rights” in telephone numbers is far outweighed by the public policy constrictions of protecting the supply of a scarce resource and not imposing unnecessary costs in the network.

A number of commenters pointed out that there is no legal basis for granting existing users of 800 numbers a right of first refusal, preferential allocation, or other property right in another telephone number in a different SAC. See, e.g., Comments of Unitel at 4; Comments of CompTel at 12, n. 15 (citing Commission precedent establishing that subscribers to toll-free numbers do not have an ownership interest in that number). Additionally, as GTE noted, a right of first refusal would appear to be at odds with the obligations of common carriers to provide service without any undue or unreasonable preference or advantage. Comments of GTE at 9.

Other commenters note that a right of first refusal would inherently disadvantage new users by preventing them from obtaining desirable numbers. See, e.g., Comments of SNET at 12; Comments of PageNet at 13; Comments of Allnet at 10, n.8 (noting that the logical outcome of such a right could be the absurd outcome of blocking out every number combination (including DDD numbers) whose equivalent alphabet combination may be confused or sound like their 800 number). Numerous other commenters note that, to the extent that parties are concerned with customer confusion or unfair trade practices, existing laws and regulations provide protection.<sup>2</sup> There is no need for the Commission to provide independent trade

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<sup>2</sup>Industry bodies, e.g. the SMS/SNAC have proposed mechanisms which would address the issue of assigning numbers which might easily be confused or used in an anticompetitive manner. To the extent that these mechanisms are agreed to and implemented by the industry groups, these mechanisms may also address the concerns raised by the 800 subscriber commenters without involving the Commission in recognizing or establishing “rights” or

protection for these businesses. See, e.g., Comments of Allnet at 9. For example, the Comments of Joseph Edward Page note that there is a well-developed area of law which provides for protection of intellectual property investments, while balancing the interests in promoting competition and permitting “fair use” of intellectual property. In fact, an FCC-granted intellectual property right could pre-empt trademark law. Comments of Joseph Edward Page, at 3.

Lastly, a number of commenters concur with USTA in noting that a right of first refusal could lead to the premature exhaust of numbers. See, e.g., Comments of SNET at 12; Comments of Ameritech at 31. It would be bad public policy to depart from the traditional first come/first served approach, which treats all 800 number subscribers fairly and equally, and does not involve the Commission in the process of assigning numbers to subscribers.

### **III. The Commission Should Recognize The Practical Consequences of Implementing New Toll Free Codes**

The NPRM concludes that all network switches in the United States should have, at a minimum, the software needed to support all toll free codes reserved by the industry in January 1995 installed by February 1997. NPRM, para. 20. The record reflects that this requirement may not be feasible. See, e.g., Comments of US West at 16; Comments of GTE at 5; Comments of Ameritech at 22; Comments of OPASTCO at 8 (Fixed implementation deadline would be arbitrary). USTA believes that provisioning of the network to process new codes should be in accordance with a comprehensive plan developed by the industry (USTA comments at 12). Reasonable advance notice will permit carriers to install and test the necessary software in a timely manner.<sup>3</sup> Furthermore, the determination that implementation of

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becoming involved in the number assignment process. See Comments of SMS/SNAC at 14.

<sup>3</sup> PageNet’s suggestion that the industry has “failed” to make the necessary upgrades on its own does not accurately reflect the fact that once the impending exhaust of the 800 code was verified, the industry has been diligent and cooperative with the Commission in upgrading the network to accommodate the 888 NPA code.

a new code is required is inherently part of the process which should be undertaken by the ICCF. See Comments of USTA at 12. The requirement to upgrade all network switches by February 1997 would impose unnecessary costs on LECs, see, e.g., Comments of SNET at 2-3 (noting that such a requirement would require LECs to replace infrastructure prematurely and would weaken their bargaining position with suppliers for replacement switches). Moreover, the record reflects no principled basis why this type of extensive upgrade is necessary to permit an efficient transition to new toll free NPA codes.

#### **IV. The Commission Should Not Partition The Toll Free Service Based on The Nature of the Subscriber**

The NPRM noted that the Commission might wish to require a partitioning of toll free service, leaving business entities and the majority of vanity number holders to use the 800 code and assigning a specific toll free code (or NPA) to subscribers for personal and pager use, and seeks comment on the feasibility of this option. NPRM, para. 46.

A number of commenters identify several reasons why this type of partitioning restriction should not be adopted. For example, PCIA notes that it would be extremely difficult to identify which numbers should be considered “vanity” numbers. Since the Commission has recognized that the merits of this type of solution depend on the scope of vanity numbers that current holders seek to protect, it would be difficult to make this partitioning a meaningful option. See Comments of PCIA at 10-11; cf. Comments of Ameritech at 29 (it is “virtually impossible” to estimate the number of vanity numbers in use).

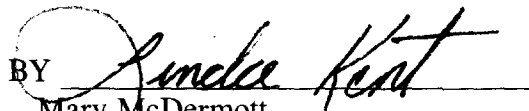
Other commenters note that it would be difficult to implement this proposal on a fair and non-discriminatory basis. See Comments of AirTouch at 13. As the Commission notes, this type of partitioning must be consistent with the Communications Act, and not be unreasonably discriminatory toward any particular class of carrier. NPRM, para. 46. Accordingly, the Commission should not adopt this proposal.

## CONCLUSION

The record reflects a wide consensus that adjustments to the process would be helpful in preventing further problems in implementing new toll free codes, and assigning numbers within those codes. However, these adjustments should not involve extensive Commission regulation of number assignment; extensive regulation would require development of complex administrative processes and could fuel the perception that numbers must be hoarded in order to be available when needed. In particular, the Commission should not establish or recognize any subscriber "rights" in toll free numbers, or any special relationships between numbers in different codes. The Commission should also not prematurely require all network switches to be upgraded to be able to process all toll free traffic in all codes reserved for toll free use by February 1997. This unnecessary expense can be avoided, while allowing industry processes to provide equipment vendors and LECs with ample time to permit efficient transitions to new toll free codes.

Respectfully submitted,

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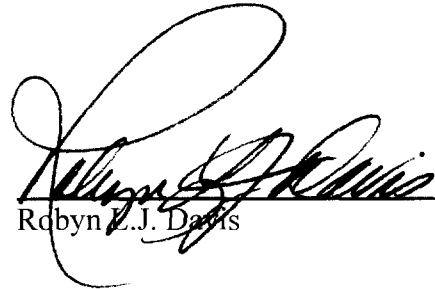
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November 20, 1995

**CERTIFICATE OF SERVICE**

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